

Defendants.

NOTICE OF REMOVAL

Page 1 of 2

3. Venue is proper in this matter in the Spartanburg Division of this Court in accordance with 28 U.S.C. §1441(a).

4. Upon information and belief, the amount in controversy in this matter exceeds \$75,000.00 as Plaintiff allegedly suffered pain and suffering, mental anguish, impairment of health and physical condition, loss of enjoyment of life, lost wages, medical expenses, which, according to Paragraph 16 of the Plaintiff's complaint (attached hereto as Exhibit A) amounts to "a sum equal to or greater than \$100,000.00."

5. Defendants have filed no pleadings in this action with the Court of Common Pleas for the State of South Carolina in response to this Complaint; however, Defendants' Answer to the Plaintiff's Complaint is filed herewith contemporaneously.

6. Defendants have furnished a copy of this Notice of Removal to the Clerk of Court for Spartanburg County.

Respectfully submitted,

SWEENEY, WINGATE & BARROW, P.A.

s/ Mark S. Barrow

Mark S. Barrow Fed. I.D. No. 1220
Aaron J. Hayes Fed. I.D. No. 11196
Adam M. Crain, Fed. ID No. 13355
Sweeny, Wingate & Barrow, P.A.
Post Office Box 12129
Columbia, SC 29211
(803) 256-2233

ATTORNEYS FOR THE DEFENDANTS

Columbia, South Carolina

March 16, 2021